

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>VANIA MOORE,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Civil Action No.:</b>
<b>v.</b>	)	<b>1:06-cv-1128-WKW-WC</b>
	)	
<b>WILLSTAFF CRYSTAL, INC.,</b>	)	
<b>d/b/a WILLSTAFF WORLDWIDE</b>	)	
	)	
<b>Defendant.</b>	)	

**JOINT MOTION TO EXTEND DISCOVERY  
AND DISPOSITIVE MOTION DEADLINES**

Plaintiff Vania Moore ("Plaintiff") and Defendant WillStaff Crystal, Inc. d/b/a WillStaff Worldwide ("Defendant") hereby move this Honorable Court to extend the current dispositive motion deadline to February 4, 2008 and the current discovery deadline to March 26, 2008. As grounds for this motion, the parties state as follows:

1. Plaintiff brings this case alleging she was discriminated and retaliated against because of her race in violation of Title VII and 42 U.S.C. § 1981. The current dispositive deadline is November 13, 2007 and the current discovery deadline is January 2, 2008.

2. Counsel for the parties conducted a face-to-face settlement conference and counsel for Plaintiff filed the report regarding settlement conference on October 12, 2007. (Dkt. No. 16). During the settlement conference counsel for the parties discussed settlement and potential mediation of this matter.

3. The parties agreed to mediate this case and scheduled mediation on December 4, 2007 with Fern Singer. While Ms. Singer had dates available in late November for mediation, the parties and their counsel had scheduling conflicts which preventing scheduling the mediation until the first week in December.

4. The parties believe that extending the current dispositive and discovery deadlines will allow the parties to mediate this matter prior to incurring the expense and cost of additional discovery and filing a summary judgment motion. In the event this matter does not settle the parties will need additional time to complete discovery and file dispositive motions.

5. Therefore, the parties request that that the current discovery and dispositive motion deadlines be extended by sixty (60) days from the date of the mediation.

WHEREFORE, the parties respectfully request the current dispositive motion deadline be extended until February 4, 2008 and the current discovery deadline be extended until March 26, 2008.

Respectfully submitted,

s/ Ethan R. Dettling

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s/ Stacey T. Bradford

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